

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
)	
JOANN INC., <i>et al.</i> , ¹)	Case No. 25-10068 (CTG)
)	
Debtors.)	(Jointly Administered)
)	
)	Re: Docket No. 17

**NOTICE OF FILING REVISED
STALKING HORSE AGREEMENT TO THE PROPOSED ORDER
(I) APPROVING BIDDING PROCEDURES, (II) SCHEDULING CERTAIN
DATES AND DEADLINES WITH RESPECT THERETO, (III) APPROVING
THE FORM AND MANNER OF NOTICE THEREOF, (IV) APPROVING
THE STALKING HORSE AGREEMENT, (V) ESTABLISHING NOTICE
AND PROCEDURES FOR THE ASSUMPTION AND ASSIGNMENT OF
CONTRACTS AND LEASES, (VI) AUTHORIZING THE ASSUMPTION AND
ASSIGNMENT OF ASSUMED CONTRACTS AND LEASES, (VII) APPROVING
THE SALE OF ASSETS, AND (VIII) GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE that, on January 15, 2025, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed the *Motion of Debtors for Entry of an Order (I) Approving Bidding Procedures, (II) Scheduling Certain Dates and Deadlines With Respect Thereto, (III) Approving the Form and Manner of Notice Thereof, (IV) Approving the Stalking Horse Agreement, (V) Establishing Notice and Procedures for the Assumption and Assignment of Contracts and Leases, (VI) Authorizing the Assumption and Assignment of Assumed Contracts and Leases, (VII) Approving the Sale of Assets, and (VIII) Granting Related Relief* [Docket No. 17] (the “Motion”). Attached thereto as Exhibit A was a proposed form of order

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

granting the relief requested in the Motion (the “Proposed Order”) and attached to the Proposed Order as Exhibit 2 was a stalking horse agreement (the “Stalking Horse Agreement”).

PLEASE TAKE FURTHER NOTICE that attached hereto as **Exhibit A** is a revised Stalking Horse Agreement (the “Revised Stalking Horse Agreement”).

PLEASE TAKE FURTHER NOTICE that attached hereto as **Exhibit B** is a redline comparing the Revised Stalking Horse Agreement to the Stalking Horse Agreement.

PLEASE TAKE FURTHER NOTICE that the Debtors intend to present the Proposed Order, including the Stalking Horse Agreement, to the Court for approval at the hearing scheduled for February 14, 2025, at 9:30 a.m. (ET).

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Dated: February 14, 2025
Wilmington, Delaware

/s/ Patrick J. Reilley

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